

EXHIBIT Q

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JAMES JIRAK and ROBERT)	
PEDERSEN,)	
)	
Plaintiffs,)	No. 07 C 3626
)	
)	
v.)	Judge Castillo
)	
)	
ABBOTT LABORATORIES INC,)	Magistrate Judge
)	
Defendant.)	Keys
)	

DEPOSITION OF MS. TERESA BODIE,
produced, sworn, and examined on the part of the
Defendant in an action pending in the United States
District Court, Northern District of Illinois,
Eastern Division, in the case of JAMES JIRAK and
ROBERT PEDERSEN, Plaintiffs, versus ABBOTT
LABORATORIES INC, Defendant, at 10:00 a.m. on
Friday, August 14, 2009, at Embassy Suites, 11301
Financial Center Parkway, Little Rock, Arkansas,
before KAREN S. ROGERS, Registered Professional
Reporter, Certified Realtime Reporter, Certified
Court Reporter, and Notary Public in and for the
State of Missouri.

1 So maybe who was the district manager you had for
2 the longest, do you remember?

3 A. Probably Bill Naids.

4 Q. How do you spell his last name?

5 A. N-A-I-D-S.

6 Q. Do you remember how long he was your
7 manager for?

8 A. A couple of years, two or three years.

9 Q. Do you remember which years?

10 A. Oh, 2002 is when he -- is when I
11 acquired him. Probably 2002 to 2003 or '4. It was
12 January of 2002 is when he started -- is when I was
13 assigned to him.

14 Q. Can you give me a general description
15 of your job duties as a pharmaceutical sales rep at
16 Abbott?

17 A. It was to call on the doctors that were
18 assigned to me and tell them about the products,
19 educate them as to the products that I was
20 representing and make sure they knew who it was for
21 and how to prescribe it. Leave samples.

22 Q. What was the ultimate goal of educating
23 the customer about Abbott's products?

24 MS. KATZENSTEIN: Objection. Misstates her
25 testimony. She never called them a customer.

1 through everything before we ever saw it.

2 Q. Those lawyers are so annoying. We ruin
3 everyone's fun.

4 A. They kept me paranoid about what I
5 could say and couldn't say.

6 Q. That's what we do best, make people
7 paranoid.

8 What was your understanding of what would
9 happen if you said something that hadn't been
10 approved by legal?

11 A. Grounds for dismissal or also
12 prosecution. I'm telling you.

13 Q. That's not a good result. So did you
14 think in your opinion that you performed well as a
15 primary care rep at Abbott?

16 A. Yes.

17 Q. What do you think made you a good rep?

18 A. I think the fact that I do -- I am a
19 friendly person. People get along with me well, so
20 the doctors pretty much got along with me well. And
21 their staff, which is just as important.

22 I did deliver the message I was supposed
23 to. And they -- you know, they didn't hate to see
24 me coming. Like there were some reps they
25 wouldn't -- they didn't want to come in. And that's

1 you more and give you more time usually.

2 It had to -- it had to do with if we
3 thought that we could influence them more just by
4 repeating the message over and over.

5 Q. When you adjusted frequencies, did you
6 have to get that approved by your manager?

7 A. Yes.

8 Q. What would happen if you adjusted
9 frequencies and didn't tell your manager?

10 A. That's not possible.

11 Q. Why not?

12 A. Because he checks them all. He has
13 access to everything.

14 Q. So when we're talking about changing
15 your frequencies, are we talking about physically
16 going into the system and changing the numbers?

17 A. Yes.

18 Q. Did you always follow the numbers that
19 were on the system?

20 A. I tried to, yes.

21 Q. But if you didn't -- you know, if it
22 said you had to call on one doctor five times and
23 you only called on him four times, was there any way
24 that your manager would know that?

25 A. Yes.